# Notification of Compliance Status Report Associated Electric Cooperative, Inc. – New Madrid Power Plant Initial Performance Test Results for Units 1 & 2 Sorbent Trap Monitoring System

National Emission Standards for Hazardous Air Pollutants (NESHAP):

Coal and Oil-Fired Electric Utility Steam Generating Units

40 CFR Part 63 Subpart UUUUU – Mercury and Air Toxics Standards (MATS)

### What is the purpose of this form?

The Mercury and Air Toxics Standards requires affected sources demonstrate initial compliance with each emissions limit that applies by conducting performance tests as specified in §63.10011. As expressed in §63.10011(c)(1), for units using a sorbent trap monitoring system to monitor mercury (Hg), performance tests must be performed on a certified system. The certification was accomplished through a performance evaluation. This Notification of Compliance Status is being submitted to satisfy the reporting requirements of the performance evaluation as per §63.10031(f)(1). The Notification of Compliance Status report must contain all of the information specified in §63.10030, paragraphs (e)(1) through (8), as applicable.

### SECTION I: DESCRIPTION OF AFFECTED SOURCE(S) (§63.10030(e)(1))

Units 1 & 2 at New Madrid Power Plant is a coal-fired unit, low rank virgin coal subcategory with the design capacity of MMBtu/hr. The unit has the following add-on controls;

- Activated Carbon Injection (ACI)
- Overfire Air (OFA)
- Selective-Catalytic Reduction (SCR)
- Electrostatic Precipitator (ESP)

Units 1 & 2 burns primarily sub-bituminous coal and fuel oil No.1 and No. 2. The Permit to Operate was issued by the Missouri Department of Natural Resources for the New Madrid Power Plant. At the time of the performance evaluation, the unit was burning sub-bituminous coal as it is the primary fuel source.

### SECTION II: SUMMARY OF TEST RESULTS (§63.10030(e)(2))

Test Dates	Constituent	Emission	Average Load	MATS LIMIT
Unit 1 08/04/2016 through 10/12/2016	Hg	0.0069 lb/GWh	MVV	0.013 lb/GWh
Unit 2 08/04/2016 through 10/12/2016	Hg	0.0039 lb/GWh	MVV	0.013 lb/GWh

### SECTION III: COMPLIANCE DEMONSTRATION METHOD (§63.10030(e)(3))

New Madrid Units 1 & 2 is designated in the coal-fired unit, low rank virgin coal subcategory and are subject to emission limits for filterable particulate matter (PM), hydrogen chloride (HCl), and mercury (Hg). Initial and ongoing compliance with PM will be demonstrated through performance testing using EPA methods 1, 2, 3A, 4 and 5. Initial and ongoing compliance with HCl will be demonstrated through performance testing using EAP methods 1, 2, 3A, 4 and 26A. Initial and ongoing compliance with Hg will be demonstrated through performance evaluation of the system using EPA methods 1 and 30B, and through performance tests as specified in table 5 to subpart UUUUU of Part 63. The fuel-specific default moisture percentage of 8% for sub-bituminous coal, as defined in §75.11(b)(1), will be applied to determine the hourly carbon dioxide (CO<sub>2</sub>) concentration to demonstrate compliance with Hg.

### SECTION IV: EMISSIONS AVERAGING (§63.10030(e)(4))

New Madrid Units 1 & 2 are not currently demonstrating compliance with Hg, PM or HCl through emissions averaging.

### **SECTION V: DEVIATIONS (§63.10030(e)(6))**

There were no deviations of the emission limit, work practice standard, or operating limit during the 30-boiler day average of Hg.

### SECTION VI: STARTUP DEFINITION (§63.10030(e)(8))

New Madrid Units rely on the startup definition, paragraph (1) in §63.10042.

Startup Paragraph (1): Either the first-ever firing of fuel in a boiler for the purpose of producing electricity, or the firing of fuel in a boiler after a shutdown event for any purpose. Startup ends when any of the steam from the boiler is used to generate electricity for sale over the grid or for any other purpose (including on-site use). Any fraction of an hour in which startup occurs constitutes a full hour of startup

# SECTION VII: CERTIFICATION AND NOTIFICATION OF COMPLIANCE STATUS UNDER THE COAL AND OIL-FIRED ELECTRIC UTILITY NESHAP (§63.10030(e)(5); (§63.10030(e)(7))

#### Check the applicable boxes:

1. A The electric utility steam generating units (EGU) referenced in Section I and Section II, have met all applicable emissions limits of 40 CFR Part 63, Subpart UUUUU.

# SECTION VIII: FACILITY INFORMATION AND CERTIFICATION BY RESPONSIBLE OFFICIAL ((§63.10030(e)(7))

(10	- \- \( \cdot \)
Facility Nam	ne: New Madrid Power Plant Units 1 & 2
Facility Stre	et Address:41 St. Jude Industrial Park, Marston, MO 63866
$\boxtimes$	No secondary materials that are solid waste were combusted in any affected unit.
	I certify that my facility has complied with the relevant standards of 40 CFR part 63, subpart UUUUU. See §63.9(h)(2)(i)(G).
	I certify that the information presented herein is true, accurate, and complete to the best of my knowledge. See §63.9(h)(2)(i).
Name (pleas	se printy: BRENT A. 1205
Signature	DATE: 10-13- 20/10

Plant: NEW MADRID POWER PLANT-AECI Report Period: 08/04/2016 Through 10/12/2016 Source: UNIT1 Parameter: HG#/GW30

Date	30 Day Average Value	Total Hours	Valid Hours	Invalid Hours	Monitor Availability	View Hourly
8/4/2016	0*	96	0	96	0	View
8/5/2016	0*	120	0	120	0	View
8/6/2016	0*	144	0	144	0	View
8/7/2016	0*	168	0	168	0	View
8/8/2016	0*	192	0	192	0	View
8/9/2016	0*	216	0	216	0	View
8/10/2016	0*	240	0	240	0	View
8/11/2016	0*	264	15	249	5.7%	View
8/12/2016	0*	287	38	249	13.2%	View
8/13/2016	0*	287	38	249	13.2%	View
8/14/2016	0*	289	38	251	13.1%	View
8/15/2016	0*	313	38	275	12.1%	View
8/16/2016	0*	337	38	299	11.3%	View
8/17/2016	0*	361	38	323	10.5%	View
8/18/2016	0*	385	38	347	9.9%	View
8/19/2016	0*	409	38	371	9.3%	View
8/20/2016	0*	433	38	395	8.8%	View
8/21/2016	0*	457	38	419	8.3%	View
8/22/2016	0*	481	38	443	7.9%	View
8/23/2016	0*	505	38	467	7.5%	View
8/24/2016	0*	529	38	491	7.2%	View
8/25/2016	0*	553	38	515	6.9%	View
8/26/2016	0*	577	38	539	6.6%	View
8/27/2016	0*	601	38	563	6.3%	View
8/28/2016	0*	625	38	587	6.1%	View
8/29/2016	0*	649	38	611	5.9%	View
8/30/2016	0*	673	38	635	5.6%	View
8/31/2016	0*	697	38	659	5.5%	View
9/1/2016	0*	721	38	683	5.3%	View
9/2/2016	0*	745	38	707	5.1%	View
9/3/2016	0.0069	769	38	731	4.9%	View
9/4/2016	0.0069	793	38	755	4.8%	View
9/5/2016	0.0069	817	38	779	4.7%	View
9/6/2016	0.0069	841	38	803	4.5%	View
9/7/2016	0.0069	865	38	827	4.4%	View
9/8/2016	0.0061	889	49	840	5.5%	View
9/9/2016	0.0051	913	73	840	8.0%	View
9/10/2016	0.0046	937	97	840	10.4%	View
9/11/2016	0.0042	961	121	840	12.6%	View
9/12/2016	0.0032	985	145	840	14.7%	View
9/13/2016	0.0032	1009	169	840	16.7%	View
9/14/2016	0.0032	1033	193	840	18.7%	View
9/15/2016	0.0032	1057	204	853	19.3%	View
9/16/2016	0.0032	1081	204	877	18.9%	View
9/17/2016	0.0032	1105	204	901	18.5%	View

Plant: NEW MADRID POWER PLANT-AECI Report Period: 08/04/2016 Through 10/12/2016 Source: UNIT1 Parameter: HG#/GW30

9/18/2016         0.0032         1129         204         925         18.1%         View           9/19/2016         0.0032         1153         204         949         17.7%         View           9/20/2016         0.0032         1177         204         973         17.3%         View           9/21/2016         0.0032         1201         204         997         17.0%         View           9/22/2016         0.0032         1225         204         1021         16.7%         View           9/23/2016         0.0032         1249         204         1045         16.3%         View           9/24/2016         0.0032         1273         204         1069         16.0%         View           9/25/2016         0.0032         1297         204         1093         15.7%         View           9/26/2016         0.0032         1321         204         1117         15.4%         View           9/28/2016         0.0032         1345         204         1141         15.2%         View           9/28/2016         0.0032         1389         204         1165         14.9%         View           9/30/2016         0.0032							
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10/9/2016         0.0043         1633         286         1347         17.5%         View           10/10/2016         0.0043         1657         310         1347         18.7%         View           10/11/2016         0.0043         1681         334         1347         19.9%         View	10/7/2016	0.0044	1585	238	1347	15.0%	View
10/10/2016         0.0043         1657         310         1347         18.7%         View           10/11/2016         0.0043         1681         334         1347         19.9%         View	10/8/2016	0.0043	1609	262	1347	16.3%	View
10/11/2016 0.0043 1681 334 1347 19.9% <u>View</u>	10/9/2016	0.0043	1633	286	1347	17.5%	<u>View</u>
	10/10/2016	0.0043	1657	310	1347	18.7%	<u>View</u>
10/12/2016 0.0043 1705 346 1359 20.3% View	10/11/2016	0.0043	1681	334	1347	19.9%	View
	10/12/2016	0.0043	1705	346	1359	20.3%	View

Plant: NEW MADRID POWER PLANT-AECI Report Period: 08/04/2016 Through 10/12/2016 Source: UNIT2 Parameter: HG#/GW30

Date	30 Day Average Value	Total Hours	Valid Hours	Invalid Hours	Monitor Availability	View Hourly
8/4/2016	0*	96	15	81	15.6%	<u>View</u>
8/5/2016	0*	120	39	81	32.5%	View
8/6/2016	0*	144	63	81	43.8%	View
8/7/2016	0*	168	87	81	51.8%	View
8/8/2016	0*	192	111	81	57.8%	View
8/9/2016	0*	216	135	81	62.5%	View
8/10/2016	0*	240	159	81	66.3%	View
8/11/2016	0*	264	167	97	63.3%	<u>View</u>
8/12/2016	0*	288	167	121	58.0%	<u>View</u>
8/13/2016	0*	312	167	145	53.5%	<u>View</u>
8/14/2016	0*	336	167	169	49.7%	<u>View</u>
8/15/2016	0*	360	167	193	46.4%	View
8/16/2016	0*	384	167	217	43.5%	<u>View</u>
8/17/2016	0*	408	167	241	40.9%	<u>View</u>
8/18/2016	0*	432	167	265	38.7%	<u>View</u>
8/19/2016	0*	456	167	289	36.6%	<u>View</u>
8/20/2016	0*	480	167	313	34.8%	<u>View</u>
8/21/2016	0*	504	167	337	33.1%	<u>View</u>
8/22/2016	0*	528	167	361	31.6%	<u>View</u>
8/23/2016	0*	552	167	385	30.3%	<u>View</u>
8/24/2016	0*	576	167	409	29.0%	<u>View</u>
8/25/2016	0*	600	167	433	27.8%	<u>View</u>
8/26/2016	. 0*	624	167	457	26.8%	<u>View</u>
8/27/2016	0*	648	167	481	25.8%	<u>View</u>
8/28/2016	0*	672	167	505	24.9%	<u>View</u>
8/29/2016	0*	696	167	529	24.0%	<u>View</u>
8/30/2016	0*	720	167	553	23.2%	<u>View</u>
8/31/2016	0*	744	167	577	22.4%	<u>View</u>
9/1/2016	0*	745	167	578	22.4%	<u>View</u>
9/2/2016	0*	745	167	578	22.4%_	<u>View</u>
9/3/2016	0*	745	167	578	22.4%	<u>View</u>
9/4/2016	0*	745	167	578	22.4%	<u>View</u>
9/5/2016	0.003861	769	191	578	24.8%	<u>View</u>
9/6/2016	0.004358	793	215	578	27.1%	<u>View</u>
9/7/2016	0.005006	817	239	578	29.3%	View
9/8/2016	0.005454	841	262	579	31.2%	<u>View</u>
9/9/2016	0.005829	864	284	580	32.9%	<u>View</u>
9/10/2016	0.006612	881	284	597	32.2%	<u>View</u>
9/11/2016	0.007729	905	284	621	31.4%	<u>View</u>
9/12/2016	0.008214	929	284	645	30.6%	<u>View</u>
9/13/2016	0.008214	953	284	669	29.8%	<u>View</u>
9/14/2016	0.008214	977	284	693	29.1%	<u>View</u>
9/15/2016	0.008214	1001	284	717	28.4%	<u>View</u>
9/16/2016	0.008214	1025	284	741	27.7%	<u>View</u>
9/17/2016	0.008214	1049	284	765	27.1%	<u>View</u>

Plant: NEW MADRID POWER PLANT-AECI Report Period: 08/04/2016 Through 10/12/2016

Source: UNIT2 Parameter: HG#/GW30

9/18/2016	0.008214	1073	284	789	26.5%	View
9/19/2016	0.008214	1097	284	813	25.9%	View
9/20/2016	0.008214	1121	284	837	25.3%	View
9/21/2016	0.008214	1145	284	861	24.8%	View
9/22/2016	0.008214	1169	284	885	24.3%	View
9/23/2016	0.008214	1193	284	909	23.8%	View
9/24/2016	0.008214	1217	284	933	23.3%	View
9/25/2016	0.008214	1241	284	957	22.9%	View
9/26/2016	0.008214	1265	284	981	22.5%	View
9/27/2016	0.008214	1289	284	1005	22.0%	View
9/28/2016	0.008214	1313	284	1029	21.6%	View
9/29/2016	0.008214	1337	284	1053	21.2%	View
9/30/2016	0.008214	1361	284	1077	20.9%	View
10/1/2016	0.008214	1385	284	1101	20.5%	View
10/2/2016	0.008214	1409	284	1125	20.2%	View
10/3/2016	0.008214	1433	284	1149	19.8%	View
10/4/2016	0.008214	1457	284	1173	19.5%	View
10/5/2016	0.004936	1481	284	1197	19.2%	View
10/6/2016	0.004737	1505	295	1210	19.6%	View
10/7/2016	0.004543	1529	319	1210	20.9%	View
10/8/2016	0.004689	1553	343	1210	22.1%	View
10/9/2016	0.005003	1577	367	1210	23.3%	View
10/10/2016	0.005037	1601	391	1210	24.4%	View
10/11/2016	0.005076	1625	415	1210	25.5%	View
10/12/2016	0.005090	1649	425	1224	25.8%	View